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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) GEN Docket No. 90-314
) ET Docket No. 92-100
Amendment of the Commission's Rules)
to Establish New Personal)
Communications Services) RM-7140, RM-7175, RM-7617,
) RM-7618, RM-7760, RM-7782,
) RM-7860, RM-7977, RM-7978,
) RM-7979, RM-7980
)
) PP-35 through PP-40
) PP-79 through PP-85

**MOTION FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS**

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. section 1.46, the Cellular Telecommunications Industry Association ("CTIA"), on behalf of its members, hereby requests a 30-day extension of the deadline for filing reply comments in the above-captioned proceeding, from December 9, 1992 to January 8, 1993. A number of other parties join in this request, including: dBX Corporation; National Association of Regulatory Utility Commissioners ("NARUC"); National Telephone Cooperative Association ("NTCA"); United States Telephone Association ("USTA"); Utilities Telecommunications Council ("UTC"); and Viacom International Inc. Good cause for this request is set forth below.

The Commission's rulemaking on personal communications services ("PCS") raises a large number of complex and interrelated issues of great importance to the public and to a large number of interested parties. Approximately 150 separate comments were filed last week in response to the Notice of Proposed Rulemaking. Many

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commenters also included lengthy studies or economic analyses with their filings. In addition, the FCC's own Office of Plans and Policy released two new working papers last week that address issues raised in the PCS proceeding. One of these studies -- Putting It All Together: The Cost Structure of Personal Communications Service by David Reed -- has been placed in the PCS docket for comment. The large demand for copies of all of these filings forced many parties to wait several days to receive copies from the FCC's contractor.

Although the parties requesting an extension have already begun a diligent analysis of these comments and related issues, the large number of issues raised in this proceeding, including the definition of PCS, eligibility requirements, licensing issues, spectrum allocation issues, market size, technical standards, and other regulatory issues, as well as the volume of comments and studies filed in the initial round, warrant additional time. A number of parties are also planning to file comments in response to the FCC's Further Notice of Proposed Rulemaking in the related spectrum reallocation proceeding encaptioned "Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies" (ET Docket 92-9); comments in that proceeding are due on December 4, several days before the December 9 filing deadline for reply comments in this proceeding. Moreover, there is an intervening holiday between now and both deadlines, which will cause the absence of a large number of key personnel who assist in the preparation of comments.

All of the parties listed above share the Commission's desire

to resolve the pending issues in the PCS proceeding as expeditiously as possible. Substantive or procedural actions undertaken on the basis of mistaken analysis, however, could ultimately result in delays in implementing PCS service. The parties requesting this extension strongly believe that the extension sought is warranted to enable the parties to provide the Commission with a more thorough analysis of the record to facilitate a full and fair resolution of these important issues.

Respectfully submitted,

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